

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

Plaintiff,

v.

JOHN L. HUTCHINS & ROBERTO SOLIMAN

Defendants.

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**NOTICE OF MOTION**

Cri. No. 22-CR-42-JLS-JJM

PLEASE TAKE NOTICE:

MOTION MADE BY:

Rodney O. Personius  
PERSONIUS MELBER LLP  
*Attorney for Defendant*  
ROBERTO SOLIMAN

DATE, TIME & PLACE:

Oral argument is not requested

RELIEF SOUGHT:

Permission for out-of-state travel by  
defendant Soliman between June 18 and  
June 20, 2022

GROUND FOR RELIEF SOUGHT:

Discretion of the Court

SUPPORTING PAPERS:

Annexed Declaration of Counsel

Dated: Buffalo, New York  
June 14, 2022

/s/ Rodney O. Personius  
Rodney O. Personius, Esq.  
PERSONIUS MELBER LLP  
*Attorneys for Defendant*  
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TO: AUSA Paul Bonnano  
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Western District of New York  
Buffalo, New York 14202

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**DECLARATION OF COUNSEL**

Cri. No. 22-CR-42-JLS-JJM

RODNEY O. PERSONIUS declares the truth of the following under the penalty of perjury:

1. I am a member of Personius Melber LLP, attorneys for Defendant Roberto Soliman.
2. Mr. Soliman is currently on pre-trial release, which includes a condition at paragraph 8(i) of the Order Setting Conditions of Release that he not leave the district absent court permission.
3. The defendant's cousin, Sandra Adly, and her husband, Jack, reside at 389 Quarry Run, Grand Island, NY 14072.
4. Mr. Soliman seeks permission of the Court to travel with the Adlys to Washington, DC over the upcoming weekend.
5. In particular, their plan is to leave Western New York on Saturday morning, June 18, 2022, by automobile.
6. While in the Washington, DC area, their intention is to stay at the Double Tree Hilton Hotel, 300 Army Navy Dr., Arlington, VA 22202-2891.
7. Mr. Soliman, his cousin, and her husband will then return by motor vehicle to Western New York on Monday, June 20, 2022.

8. United States Probation Officer Andre McCray, who supervises the defendant's pretrial release, has no opposition to this requested travel.

9. Assistant United States Attorney Paul Bonanno defers to the judgment of USPO McCray regarding this requested out-of-state travel.

**WHEREFORE**, application is hereby made for approval by the Court of out-of-state travel by defendant Roberto Soliman to Washington, DC and Arlington, VA between June 18 and June 20, 2022.

Dated: Buffalo, New York  
June 14, 2022

/s/ Rodney O. Personius  
Rodney O. Personius